

Before the
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

JUN 21 1999

In the Matter of)

Amendment of Parts 2 and 25 to Implement
the Global Mobile Personal Communications
by Satellite (GMPCS) Memorandum
of Understanding and Arrangements)

)
)
)
)
)
)

FEDERAL COMMUNICATIONS COMMISSION
IB Docket No. 99-67 OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

To: The Commission

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc.
("APCO") hereby submits the following comments in response to the Commission's
Notice of Proposed Rulemaking in the above-captioned proceeding.

APCO is the nation's oldest and largest public safety communications
organization. Most of its 13,000 individual members are state or local government
employees involved in the management, design, and operation of police, fire, emergency
medical, local government, highway maintenance, forestry conservation, disaster relief,
and other public safety communications systems. APCO represents the entire public
safety communications community in a wide array of matters before the Commission,
Congress, and other agencies. On wireless/9-1-1 issues, APCO has worked closely other
public safety organizations and industry representatives to adopt and implement rules that
will ultimately allow for the location and call-back number of every 9-1-1 call to be
identified when the call is received at a Public Safety Answering Point (PSAP).

The Commission is seeking comments regarding proposed rules to govern the use
of Global Mobile Personal Communications by Satellite ("GMPCS") terminals within the

No. of Copies rec'd
List ABCDE

049

United States. The Commission inquires in paragraph 98 as to whether GMPCS terminals must have enhanced 9-1-1 capability, similar to the Phase I/Phase II requirements that apply to terrestrial cellular and Personal Communications Service (PCS) wireless telecommunications carriers. Specifically, should a 9-1-1 call from GMPCS terminal within the United States automatically transmit the location and call-back number to the relevant Public Safety Answering Point (PSAP) for the jurisdiction in which the caller is located? The answer to that question must be yes, at least to the extent that GMPCS terminals are used in the same basic manner as terrestrial wireless telephones.

GMPCS customers in the United States are likely to have the same expectations as cellular and PCS customers when making a 9-1-1 call. They will expect to be found if there is an emergency. Indeed, GMPCS may be used primarily within the United States in isolated areas with little or no cellular/PCS coverage (*e.g.*, wilderness areas and extremely rural areas far from population centers). In those areas in particular, an automatic location for a 9-1-1 call may be critical if the caller cannot otherwise identify his or her location. Since GMPCS has yet to be implemented in the U.S., now is the time to set the standards for 9-1-1 performance. The Commission must not repeat the unfortunate history of cellular, and to a lesser extent PCS, where substantial infrastructure and subscriber equipment was already in use when the E9-1-1 rules were adopted, thus requiring an extended implementation period.

The technology to implement wireless enhanced 9-1-1 is developing quickly, and will certainly be in a mature state when GMPCS units are commercially available in the United States. Thus, there would appear to be no technical reason not to require E9-1-1

capability for GMPCS from the outset. Satellite-based location technologies (*e.g.* using GPS) may be of particular relevance to GMPCS, since GMPCS is not expected to have an extensive terrestrial network. Such satellite based location technologies claim accuracy levels at least as good as that required by Phase II, and substantially higher levels in some environments. Thus, there is no need to impose a less restrictive requirement on GMPCS. If anything, there may be a basis for requiring a substantially higher level of accuracy.

The most difficult issue in applying Enhanced 9-1-1 to GMPCS may be in the routing of the 9-1-1 call. Presumably, all U.S. GMPCS calls will be downlinked to a small number of “gateways,” with 9-1-1 calls then routed through the public switched network to the appropriate Public Safety Answering Point (PSAP). The problem may be in creating an accurate database that matches the geographic coordinates of each 9-1-1 caller with the jurisdictional boundaries of each PSAP throughout the nation. With terrestrial wireless systems, there is at least a fixed transmitter site associated with each call, thus facilitating selective routing of 9-1-1 calls to the PSAP with responsibility for the area in which the site is located. However, despite this issue, the Commission must move forward and adopt E9-1-1 rules for GMPCS. APCO will then work with public safety organizations, the relevant GMPCS providers, and Local Exchange Carriers to solve this and other implementation issues.

Therefore, for the reasons set forth above, the Commission should adopt
Enhanced 9-1-1 rules for GMPCS.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
COMMUNICATIONS OFFICIALS-
INTERNATIONAL, INC.

By:



Robert M. Gurss
WILKES, ARTIS, HEDRICK & LANE,
Chartered
1666 K Street, N.W. #1100
Washington, D.C. 20006
(202) 457-7329

June 21, 1999